

From: "Eric Elson" <eelson@foundation.sdsu.edu>
To: "Victor Vasquez" <Vvasquez@waterboards.ca.gov>
Date: 2/7/2007 3:00:36 PM
Subject: SCR: 12-01503.02: VASQV - Tentative Order No. R9-2007-0006

Victor,

Please see the email below and include the information as formal comments for consideration. One of our concerns of course is for total nitrogen. If possible, maybe incremental limitations above channel conditions at time of sampling can be included.

Thank you.

Eric Elson
Project Manager
SDSU Research Foundation
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From: Eric Elson
Sent: Tuesday, February 06, 2007 4:29 PM
To: 'Rick Gersberg'
Cc: Norma Clark; bharper@sunstroke.sdsu.edu; 'Stanley Maloy'; 'Victor Vasquez'
Subject: RE: NPDES Tentative Order / FSML Grant

Rick,

Chris at PBS&J has reviewed the effluent limitations mentioned below (and as stated in the Regional Board's Tentative Order), and found that although they're stringent, they are reasonable assumptions by the Regional Board. Regarding each of the parameters, Chris stated the following:

- BOD: Limitations should not be an issue based on the data provided.

- Total Suspended Solids: This may be an issue down the road if research increases, but there isn't enough data to make a determination at this point.
- Total Nitrogen: There will be days when existing ammonia levels in the channel are pushing the limits. If we add N, then we could easily be over the limitations. For example, the maximum daily limit is 0.14 mg/L; however, PBS&J's sampling data shows a range in the channel from 0.03 mg/L to 0.17 mg/L.
- Total Phosphorus: PBS&J does not have data on this.

I guess the bottom line is that water quality in the channel is dynamic and even though there are potential issues with these limitations, PBS&J states there isn't enough data to say a treatment system would be required. Of course, our effluent will probably have better water quality if it comes from the filtered system. PBS&J stated that based on their evaluation there isn't anything glaring that indicates we'll be non-compliant, we'll just need to operate the system and see what our regular monitoring shows. The Regional Board's limitations are assumptions based on PBS&J's calculations and if we cannot meet them we'll need to work with the Regional Board once we can show actual data. I think that's one of the main issues right now is that we don't have actual data from our system.

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From: Rick Gersberg [mailto:rgersber@mail.sdsu.edu]
Sent: Monday, January 29, 2007 12:49 PM
To: Eric Elson
Cc: Norma Clark
Subject: Re: NPDES Tentative Order / FSML Grant

Eric:

I have looked at the tentative order, and (as I have already commented to you) it looks like they have positively responded to the substantive